



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



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Certified Mail: 7003 1680 0000 6173 5425

January 18, 2008

Mr. John M. Scherrei
Fire Chief
Santa Barbara County Fire Department
4410 Cathedral Oaks Road
Santa Barbara, California 93110

Dear Mr. Scherrei:

The California Environmental Protection Agency (Cal/EPA), Office of Emergency Services, Department of Toxic Substances Control, and the State Water Resources Control Board conducted a program evaluation of the Santa Barbara County Fire Department Certified Unified Program Agency (CUPA) on December 19 and 20, 2007. The evaluation was comprised of an in-office program review and field oversight inspections. The State evaluators completed a Certified Unified Program Agency Evaluation Summary of Findings with your agency's program management staff, which includes identified deficiencies, with preliminary corrective actions and timeframes, program observations and recommendations, and examples of outstanding program implementation.

The enclosed Evaluation Summary of Findings is now considered final and based upon review, I find that the Santa Barbara County Fire Department CUPA program performance is satisfactory with some improvement needed. To complete the evaluation process, please submit Deficiency Progress Reports to Cal/EPA that depict your agency's progress towards correcting the identified deficiencies. Please submit your Deficiency Progress Reports to JoAnn Jaschke every 90 days after the evaluation date. The first deficiency progress report is due on March 19, 2008.

Cal/EPA also noted during this evaluation that the Santa Barbara County Fire Department CUPA has worked to bring about a number of local program innovations, including: implementing an outstanding educational and outreach program and providing a good analysis of the data collected in their self audit. We will be sharing these innovations with the larger CUPA community through the Cal/EPA Unified Program web site to help foster a sharing of such ideas statewide.

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Thank you for your continued commitment to the protection of public health and the environment through the implementation of your local Unified Program. If you have any questions or need further assistance, you may contact your evaluation team leader or Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or by email at jbohon@calepa.ca.gov.

Sincerely,

[Original signed by Don Johnson]

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosure

cc/Sent via email:

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Linda S. Adams
Secretary for
Environmental Protection

California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment
State Water Resources Control Board • Regional Water Quality Control Boards



Arnold Schwarzenegger
Governor

Amended

CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION SUMMARY OF FINDINGS

CUPA: Santa Barbara County Fire Department

Evaluation Date: December 19 and 20, 2007

EVALUATION TEAM

Cal/EPA: JoAnn Jaschke
SWRCB: Terry Snyder
OES: Jeffrey Tkach
DTSC: Asha Arora

This Evaluation Summary of Findings includes the deficiencies identified during the evaluation, program observations and recommendations, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to JoAnn Jaschke at (916) 323-2204.

	<u>Deficiency</u>	<u>Preliminary Corrective Action</u>
1	<p>The CUPA has not established the following administrative procedures.</p> <ul style="list-style-type: none"> • Public participation procedures • Records maintenance procedures • Procedures for forwarding the HMRRP information in accordance with HSC sections 25503(d) and 25509.2 (a) (3) • Financial management procedures <p>The CUPA does address some of these items within their application for certification.</p> <p>CCR Title 27 section 15150 (e)) and 15180 (e) (1), (2), (4), and (5) [Cal/EPA]</p>	<p>By December 20, 2008, the CUPA will develop and submit copies of the administrative procedures required under Title 27 section 15180 (e).</p>
2	<p>The CUPA is not implementing their inspection and enforcement program in a manor consistent with the laws, regulations, and their draft Inspection and Enforcement</p>	<p>By March 20, 2008, the CUPA will follow up with Santa Maria Car Wash and start initiating the appropriate enforcement action for this facility.</p>

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<p>Plan.</p> <p>The latest UST inspection report dated July 12, 2006, for Santa Maria Car Wash noted significant violations and ordered the facility to forth with assure that all sensors are properly anchored into a position to detect leaks properly and by August 12, 2006, to repair and replace defective 87 and 91 line leak detectors and retest in the presence of representative from the CUPA office. As of December 20, 2007, the CUPA does not have any documentation indicating the facility corrected the violations nor has the CUPA started initiating formal enforcement against this facility for the noted significant violations.</p> <p>The CUPA's annual summary reports do not adequately demonstrate that all Class I Hazardous Waste violations are having formal enforcement actions taken for them. The Annual Enforcement Report 4 for FY 04/05, shows a total of 4 facilities with Class I violations. The FY 06/07 show a total of 5 facilities with Class I violations. One enforcement action was taken during the FY 04/05 and no enforcement action was taken during the FY 06/07.</p> <p>The draft Inspection and Enforcement Plan does not address the appropriate confidentially, coordinated application of enforcement standards, and identification of enforcement actions that are consistent and predictable for similar violations and not less stringent than state statue and regulations under the enforcement section. In addition, the plan has been in draft form for the last three FYs (04/05, 05/06, and 06/07)</p> <p>CCR, Title 27 section 15200 and 15290 (g) CCR, Title 23 section 2636 (f) (2) HSC section 25299 [Cal/EPA, SWRCB, and DTSC]</p>	<p>The CUPA will continue to provide Cal/EPA updates, via deficiency progress reports, on the case until a final settlement has been reached.</p> <p>The CUPA shall provide a summary of the enforcement status of all facilities identified as having Class I hazardous waste violations in FY 06/07. This summary shall be provided by March 20, 2008. Additionally the CUPA shall ensure that the proper enforcement action was taken in each instance.</p> <p>By December 20, 2008, the CUPA will finalize their Inspection and Enforcement Plan.</p> <p>The CUPA will initiate the appropriate enforcement action for non-minor violations identified during inspections within the 135 days from the date of inspection.</p>
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3	<p>The CUPA is not properly documenting the training and expertise of their staff. The standards within the job classifications, the draft Inspection and Enforcement Plan, and the on-going training activities used by the CUPA meet the requirements of Title 27 section 15260; however the CUPA is not properly documenting this.</p> <p>CCR, Title 27 section 15260 [Cal/EPA]</p>	<p>By June 20, 2008, the CUPA will submit Cal/EPA the proper training documentation.</p>
4	<p>In four of five files reviewed from both CUPA offices (Santa Barbara and Buellton), UST plot plans were not found. The one plot plan found did not contain all the required elements. The plot plan was missing the location(s) of where the monitoring will be performed. Examples of missing locations include the sensors for tanks, sumps, under-dispenser containments, line leak detectors, and monitoring panels for automatic tank gauges and alarms.</p> <p>CCR, Title 23 sections 2632(d)(1)(C) and 2641(h) [SWRCB]</p>	<p>Beginning December 21, 2007, UST plot plans will be required. Plot plan requirements will be modified to include location of all leak detection monitoring equipment. The CUPA will request for updated plot plans to be submitted by the time the UST facility is annually inspected. In addition, the CUPA will ensure that new permit application materials also contain completed plot plans. By December 21, 2008, the CUPA will ensure that all facilities have UST plot plans that contain all the required elements.</p>
5	<p>The CUPA is not sending information pertaining to underground storage tank program using Report 6 on a quarterly basis. The CUPA has only submitted one report for the last two years.</p> <p>HSC 25299.7 (b) Title 27, Section 2713 [SWRCB]</p>	<p>By December 28, 2007, the CUPA will submit Report 6 for the July through September 2007 quarter and continue to submit quarterly Report 6s when due.</p>
6	<p>The CUPA has not met the mandated inspection frequency for UST facility compliance inspections during the last year. In FY 04/05, the CUPA completed UST compliance inspections for 93% of their regulated UST facilities. In FY 05/06, the CUPA completed UST compliance inspections for 79% of their regulated UST facilities. In FY 06/07, the CUPA completed UST compliance inspections for 86% of the regulated UST facilities. For July through December 2007, the CUPA completed UST compliance inspections for 55 of the regulated UST facilities. The CUPA's goal is to meet the inspection frequencies and conduct the compliance inspection</p>	<p>The CUPA will conduct compliance inspections for all UST facilities each year and will report their progress towards meeting the required inspection frequency in the deficiency progress reports.</p>

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	<p>during the annual monitoring certification. The CUPA previously had only three certified UST inspectors and currently has six inspectors with five being ICC certified so the inspection percentage should be increasing. The CUPA stated that they are using a risk-based evaluation process to first inspect the facilities with the highest potential for environmental impacts or are recalcitrant in returning to compliance after Notice of Violation. This provides maximum protection for the environment yet may reduce compliance frequencies.</p> <p>HSC section 25288 (a) [SWRCB]</p>	
7	<p>The CUPA is not inspecting or ensuring the Cooperating Agencies (CA) are inspecting all businesses, subject to the business plan for compliance every 3 years. Of the eleven business plans reviewed six facilities had not been inspected within the last three years:</p> <ul style="list-style-type: none"> • Gold Coast Farms was last inspected on 7/6/99 • Spring Harvest Berry Farm was last inspected on 5/11/99 • Santa Rosa Cooling was last inspected on 11/6/92 • Skyway Aviation Fuels Inc. was last inspected on 6/10/94 • Santa Barbara City Parks Dept. was last inspected on 7/7/98 • Santa Ynez River Water Conservation did not include an inspection report with the file. <p>HSC section 25505 (c) [OES]</p>	<p>By March 20, 2008, the CUPA must submit an action plan outlining how CUPA will maintain their inspection frequency and continue to report their progress towards meeting the required inspection frequencies in the deficiency progress reports.</p> <p>Additionally, the CUPA will require the CA to provide the CUPA an action plan outlining how the CA will maintain their inspection frequency and continue to report their progress towards meeting the required inspection frequencies to the CUPA.</p>
8	<p>The CUPA is not ensuring that the businesses, subject to the hazardous materials business plan, annually submit their hazardous materials <i>Annual Business Plan Certification</i> (which includes annual inventory and business plan review). Of the eleven business plan files reviewed, including the four agriculture files, at the Buellton office, five did not have a current Annual Business Plan Certification.</p> <p>HSC section 25503.3 (c) and 25505 (c) [OES]</p>	<p>By March 20, 2008, the CUPA must submit an action plan outlining how the CUPA will maintain current certifications among the business plans</p> <p>Additionally, the CUPA will report their progress in implementing their action plan in the deficiency progress reports.</p>

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<p>9</p>	<p>The CUPA is not completely implementing the Business Plan program. The CUPA has approximately 40 facilities that were previously exempted from the business plan program that are no longer exempt. OES staff reviewed two Special District Exempt facility files falling into this category. Both of these files did not have current business plans.</p> <p>HSC section 25505 (a) [OES]</p>	<p>By March 20, 2008 the CUPA must submit an action plan outlining how the CUPA will properly regulate these businesses under the Business Plan in accordance to HSC section 25505 (a).</p> <p>Additionally, the CUPA will report their progress in implementing their action plan in the deficiency progress reports.</p>
<p>10</p>	<p>As identified in the 2005 CUPA evaluation, CUPA has not reviewed or updated their Area Plan within the last 36 months. The Area Plan was implemented in 2003.</p> <p>HSC section 25503 (d) [OES]</p>	<p>The CUPA has received an HMEP Grant to update their Area Plan. By December 20, 2008 the CUPA shall have an approved updated Area Plan implemented.</p>
<p>11</p>	<p>The CUPA does not have a CalARP dispute resolution procedure.</p> <p>CCR, Title 19 section 2780.1 [OES]</p>	<p>By June 30, 2008, the CUPA must establish a dispute resolution procedure and provide a copy to Cal/EPA with the deficiency progress report that satisfies all elements of CCR, Title 19 section 2780.1.</p>
<p>12</p>	<p>The CUPA is not meeting their inspection frequency for the CalARP regulated facilities. For FY 04/05, the CUPA inspected 22 of the 56 regulated CalARP facilities. For FY 05/06, the CUPA inspected 6 of the 52 regulated Cal/ARP facilities. For FY 06/07, the CUPA inspected 3 of the 45 regulated CalARP facilities. CalARP facilities have extremely hazardous materials and should be identified as a high priority for inspection compliance.</p> <p>CCR, Title 19 section 2775.3 [OES]</p>	<p>By March 20, 2008 the CUPA must submit an action plan outlining how the CUPA plans on meeting the required inspection frequency for CalARP regulated facilities.</p> <p>Additionally, the CUPA will report their progress in implementing their action plan in the deficiency progress reports.</p>
<p>13</p>	<p>The CUPA is not meeting its inspection frequency identified in the draft Inspection and Enforcement Plan for businesses subject to the hazardous waste program. Additionally, the CUPA is not meeting the required tiered permitting inspection frequency.</p> <p>a. A review of the FY 04/05, 05/06, and 06/07 Inspection Summary Report 3 and the FY 04/05, 05/06, 06/07 CUPA Self-Audit Reports indicate that</p>	<p>By March 20, 2008 the CUPA must submit an action plan outlining how the CUPA plans on meeting the required inspection frequency for all hazardous waste regulated facilities.</p> <p>Additionally, the CUPA will report their progress in implementing their action plan in the deficiency progress</p>

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	<p>the CUPA has conducted 21%, 26%, and 27% HWG regulated businesses during each of the past 3 fiscal years.</p> <p>b. The following files reviewed (in the Santa Barbara and Buellton offices) showed the following dates for the latest inspection.</p> <ul style="list-style-type: none"> • Innovative Micro Technology, 75 Robin Hill Road, Goleta, CA 93117 - 5/13/04 • Raytheon, 75 Coromar Drive, Goleta, CA 93117 - 4/9/03 • Alan Hancock College, 800 S. College Drive, Santa Maria, CA 93454 - 7/22/99 • Lompoc High School, 515 W College Ave, Lompoc, CA 93436 - never been inspected. <p>HSC, sections 25201.4 (b) and CCR, Title 27 section 15200(f) and CUPA's draft Inspection and Enforcement Plan [DTSC]</p>	<p>reports.</p>
14	<p>The CUPA is not ensuring that businesses submit their annual CA/PBR update or their CA/PBR authorization treatment notifications. For example: A copy of the latest PBR was not in the file for Innovative Micro Technology.</p> <p>To address this, the CUPA added a line in their inspection checklist to verify that the facility has submitted PBR/CA/CE notification during an inspection, but there is no mechanism in place to ensure annual notifications are received during interim years from PBR/CA facilities.</p> <p>CCR, Title 27, section 15200, and Title 22, section 67450.3(c)((1), [DTSC]</p>	<p>The CUPA shall have a procedure for the receipt of tiered permitting reports.</p> <p>By March 20, 2008, the CUPA will start taking the appropriate action to obtain the required information from Innovative Micro Technology and the other PBR/CA facilities.</p>
15	<p>The CUPA is not conducting inspections in a manner consistent with state statute or regulation for businesses subject to tiered permitting program. During the oversight inspection, the CUPA inspector had missed the following violations observed for LQGs and tiered permitting:</p> <ul style="list-style-type: none"> • Failure to have a written inspection schedule (container -weekly, tanks -daily, and emergency equipment - monthly); and failure to conduct inspections and maintain records 	<p>Effective immediately the CUPA shall ensure that they are conducting inspections in a manner consistent with state statute or regulation for businesses subject to tiered permitting program.</p> <p>The DTSC staff conducting the oversight inspection explained these violations to the inspector, and the</p>

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	<p>of inspections conducted, including corrections made.</p> <ul style="list-style-type: none"> • Failure to have tank integrity assessments for the generator and tiered permitting tanks. • Failure to provide secondary containment for an open, used oil tank located near soil. • Failure to maintain aisle space in the rear room of the R&D lab. • Failure to provide job specific training to employees involved in tiered permitting units and labs conducting bench top treatments. • Failure to maintain operating logs for tiered permitting units. • Failure to close a tiered permitting unit operating under a conditional authorization (CA) tier for approximately six (6) years. • Failure to conduct inspections as per tiered permitting requirements. • The inspector did not cite violations consistent with definitions of minor, Class II or Class I as provided in state statute law and regulation. (Celite Corporation, 2500 Miguelito Road, Canyon Road, Lompoc, CA - During the oversight inspection on 11/15-16/07, failure to provide secondary containment for hazardous waste treatment tanks and failure to conduct daily tank inspections were cited as minor violations) <p>During the oversight inspection, it was also noted that in 2000, the facility submitted a letter without any supporting documentation to the CUPA, requesting concurrence that five (5) of their nine (9) tiered permitting units are exempt. The CUPA had not responded to their request, even though other CUPA staff had conducted hazardous waste generator inspections of this site in 2003 and 2006. Due to the complexity of the exemption requirements, DTSC can provide assistance to the CUPA to determine the correct status of the five (5) units in question.</p> <p>CCR, Title 27, section 15200 [DTSC]</p>	<p>inspector sent an addendum report</p> <p>By March 20, 2008, the CUPA shall provide LQG and tiered training to their inspectors in addition to the training the CUPA staff have received during the annual CUPA conference.</p>
16	<p>The CUPA is not citing violations consistent with definitions of minor, Class II or Class I as provided in state statute law and regulation. For example:</p>	<p>The CUPA will refresh staff knowledge of the definitions of Class I, Class II and minor violations. A</p>

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	<ul style="list-style-type: none"> • Raytheon, 75 Coromar Drive, Goleta, CA 93117, a LQG facility was inspected on 4/9/03, 2/13/03, 4/17/02, 3/5/02, and 1/17/02, storage of hazardous waste greater than 90 days was cited as a minor violation. • Velasquez Ranch, 390 Bell Road, New Cuyama, CA, a compliant inspection was conducted on 1/3/07 numerous violations observed including noted: illegal treatment of HW (paint, oil, filters, paint cans, applicable weed killers by burning), storage greater than 90 days, waste shipped to an unauthorized facility were cited as Class II violations. <p>These types of violations are considered Class I violations.</p> <p>CCR, Title 27, section 15200 (f)(2)(C), and HSC, sections 25110.8.5, and 25117.6, and CCR Title 22, section 66260.10 [DTSC]</p>	<p>good tool for refresher training may include covering the Cal/EPA “Violation Classification Guidance Document for Unified Program Agencies” which can be found on the Cal/EPA website under Unified Programs Inspection and Enforcement Resources.</p> <p>By March 20, 2008, the CUPA will begin taking formal enforcement against the facilities noted and shall submit documentation with the deficiency progress reports.</p>
17	<p>The CUPA is not ensuring that all facilities that have received a notice to comply citing minor violations have returned to compliance within 30 days of notification. Either businesses must submit a Return to Compliance in order to document its compliance or in the absence of certification CUPA must follow up with the business to confirm that compliance has been achieved. For example:</p> <ul style="list-style-type: none"> • Santa Maria Railroad was last inspected on 10/29/06 labeling violations and storage violations were noted and no RTC was in the file. • Innovative Micro Technology was last inspected on 5/13/04, employee training and labeling violations were noted and no RTC was in the file. <p>CCR, Title 27, section 15200 (f)(2), and HSC, section 66260.10 and 25187.8(g)(1), [DTSC]</p>	<p>The CUPA shall ensure that facilities have RTC either by a RTC certification or re-inspections.</p> <p>By March 20, 2008, CUPA shall ensure that the facilities with minor violations have returned to compliance and shall submit documentation with the deficiency progress reports.</p>

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18	<p>During the file review, DTSC evaluator noted and asked clarifying questions for the silver only facilities. For example: Specialty Photo/Color Services, 132 Garden Street, Santa Barbara, CA 93101 was last inspected on 7/19/07 as a TP facility; 9/6/05 inspection noted as a TP inspection, P2/SB14 informational; and 10/24/04 inspection was listed as “3” inspections for Gen, TP, and P2/SB14. The inspection reports of 2004 and 2005 were unsigned and written in pencil and unclear if these reports were provided to the facility.</p> <p>CUPA shall provide training to the staff for hazardous waste regulations since the law changed in 1999 for the silver only facilities. In California, silver only facilities are regulated same as the federal regulations and SB14 is a California state requirements</p> <p>CCR, Title 22, section 66265.16 (d) [DTSC]</p>	<p>By March 20, 2008, CUPA shall provide the proper hazardous waste training specific to the job and shall submit documentation with the deficiency progress reports.</p>
19	<p>The CUPA has not completed an annual self audit in compliance with Title 19, Section 2780.5 (b)(1)(2)(3)(4)(5)(7)(8) for the CalARP Programs in that lists of CalARP facilities were not provided in the self audit.</p> <p>CCR, Title 19 section 2780.5</p>	<p>The CUPA's FY 07/08 annual self audit shall include lists of CalARP facilities in compliance with Title 19 Section 2780.5 (b)(1)(2)(3)(4)(5)(7)(8).</p> <p>By September 30, 2008, the CUPA will submit a copy of the CUPA's FY 07/08 self audit to Cal/EPA.</p>

CUPA Representative

Ann Marie Nelson
(Print Name)

Original signed
(Signature)

Evaluation Team Leader

JoAnn Jaschke
(Print Name)

Original signed
(Signature)

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PROGRAM OBSERVATIONS AND RECOMMENDATIONS

The observations and recommendations provided in this section address activities the CUPA are implementing and/or may include areas for continuous improvement not specifically required of the CUPA by regulation or statute.

1. **Observation:** The UST inspection checklist generally identifies all of the elements that the inspector reviews at the site, but Significant Operational Compliance (SOC) items are not indicated on the checklist.

Recommendation: The SWRCB encourages the CUPA to improve the inspection checklist by identifying the SOC items on the checklist. This will make compliance determination easier for tracking and reporting purposes.

2. **Observation:** The CUPA's UST facility files are not well organized from file to file yet information is easily obtained in the individual file folder's sections. In the five files reviewed, some of the documents were not filed chronologically, duplicate and in some cases triplicate copies of the same documents were found, and/or supporting information was placed on top of a section, which may lead to misunderstanding the order or importance of the following documentation. Also sections were not labeled which could lead to the disorganization of information from file to file.

Recommendation: The SWRCB strongly encourages the agency to ensure that documents are filed chronologically, duplicate information removed, and that outdated material be removed from the file if it is no longer required or contains information not needed by the CUPA. Also if files are to be sectioned then the sections should be labeled and be consistent from file to file. (e.g. one section for facility forms with related correspondence, one section for inspection forms, one section for general correspondence, etc.)

3. **Observation:** There were a number of files that were inactive; however they were not identified as inactive. Some of these businesses had been out of operation for some time and the business plan files were not updated to state as such.

Recommendation: CUPA should review their database and facility files to ensure that all files are up to date as they pertain to the business plan files.

4. **Observation:** The CUPA inspector conducted a complete site walkthrough of this facility during the hazardous waste oversight inspection. The inspector reviewed applicable documents, built a good rapport with the facility representatives. The CUPA inspector was also professional and courteous in explaining hazardous waste requirements.

Recommendation: Continue making good recommendations to the facilities.

5. **Observation:** The CUPA inspector did not have access to a digital camera in order to provide evidence of violations observed during the oversight inspection.

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Recommendation: DTSC recommends that the Santa Barbara County CUPA should provide digital cameras to their inspectors to take photographs to support their violations observed in the field.

6. **Observation:** A review of the hazardous waste/tiered permitting files did not document who gave consent in approximately 50% of files reviewed on the inspection reports.

Recommendation: DTSC recommends that CUPA inspectors should request, obtain, and document consent to conduct the inspection from the authorized agent before beginning the inspection.

7. **Observation:** Additional information could be added to the CUPA's inspection reports to support class I and II violations.

Recommendation: DTSC recommends that the inspector should add details of the observed violations to provide a clear and concise picture of any violations and strengthen the inspection reports when informal or formal enforcement actions are taken. Inspector should request a map of the facility with hazardous waste management areas noted.

8. **Observation:** The draft Inspection and Enforcement Plan does not include a timeline for correcting non-minor violations.

Recommendation: DTSC recommends that the CUPA should provide a time frame (due date) to the facility for the non-minor violations to expedite a return to compliance. A non-compliance with non-minor violations could be subject to multiday penalties.

9. **Observation:** DTSC staff observed that the CUPA's files were not organized and multiple copies of the same documents were in the files. Also noted that the hazardous waste generator inspection and the facility responses were separated, which made it difficult to verify if a facility had come to compliance.

Recommendation: I recommend that the CUPA organize their files and keep hazardous waste inspection report and response together to make it easier to verify compliance status.

10. **Observation:** The CUPA was not able to demonstrate that complaints which were referred by DTSC were investigated.

Recommendation: Ensure that complaints are being received by the CUPA from DTSC by providing the e-mail address of the person who should receive complaints to CRosana@dtsc.ca.gov complaint coordinator. Investigate and document all complaints referred. Investigation does not always entail inspection, as many issues may be resolved by other means such as a phone call. In any instance, it is suggested that all investigations be documented in the inspection report. Please notify the complaint coordinator of the disposition of the complaints.

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EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. The CUPA's educational and outreach program is outstanding. The CUPA staff is active with the local Community Awareness & Emergency Response (CAER) group and assists them with training throughout the year. A CUPA specialist did a presentation to the Southern California Caltrans group. Additionally, the CUPA staff teaches CUPA permitting and Business Plan basics at a local community college and assist small business owners in writing their Business Plans either on-site or at the CUPA office.
2. The CUPA's on-going training effort is commendable. Each CUPA staff that attends the annual CUPA conference has to present mini-trainings on the information covered within each session he or she attended to the rest of the CUPA staff.
3. The CUPA is doing a good job with tracking their data. This allows the CUPA to monitor their inspection frequencies, track the number of businesses that have corrected any violations, have outstanding violations, and those that did not have any violations. In turn, the CUPA is able to complete and submit detailed Annual Summary Reports to Cal/EPA.
4. On December 18, 2007, the CUPA Inspector conducted the UST site inspection in a thorough and professional manner. His attention to detail and knowledge of code and regulations resulted in an excellent inspection. The CUPA Inspector required the service technician to test the fail-safe operation of the sensors by disabling the sensor boards in the Veederroot Control Panel and when this failed, he required the service technician to reprogram the control panel to function in fail-safe mode. The CUPA Inspector also asked the SWRCB Evaluator for suggestions on how to improve his inspection technique and procedure.
5. The CUPA's self audit provides a good analysis of the data collected, allowing the CUPA to look at trends and identify strengths and weaknesses of its program. Examples include the routine inspection rates, rates of inspections resulting in violations, and rates of facilities that have returned to compliance within expected time frames.
6. The CUPA has done a good job of implementing changes identified during previous evaluations as deficiencies and recommendations for change. Of note, violation classification and documentation have shown marked improvement in those files reviewed that had inspections conducted since the past evaluation date.
7. The CUPA Department Assistant has been working with Vandenberg Air Force Base and the sheriff's department on their federal mandated terrorism plan to identify acutely hazardous materials.